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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

SEALED

BY ORDER OF THE COURT

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

10 AUG 12 2014  
at o'clock and min. M.  
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	MAG. NO. 14-0877 RLP
	)	
Plaintiff,	)	CRIMINAL COMPLAINT;
vs.	)	AGENT'S AFFIDAVIT
	)	
KALANI WATSON, (01)	)	
aka "Kiki Seui",	)	
ROGUSSIA EDDIE ALLEN	)	
DANIELSON, (02)	)	
AJ WILLIANDER, (03)	)	
	)	
Defendants.	)	
	)	

CRIMINAL COMPLAINT

I, the undersigned complainant being duly sworn states the following is true and correct to the best of my knowledge and belief.

**COUNT 1**

On or about April 22, 2014, in the District of Hawaii, MARCUS KALANI WATSON, also known as “Kiki Seui,” did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that Defendant MARCUS KALANI WATSON, also known as “Kiki Seui,” did unlawfully take and obtain personal property from the person and in the presence of S.D. and S.L., employees of the Reynolds Recycling Center located at 4510 Salt Lake Boulevard, Honolulu, Hawaii, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person(s).

All in violation of Title 18, United States Code, Section 1951.

**COUNT 2**

On or about May 1, 2014, in the District of Hawaii, defendant KALANI WATSON, aka “Kiki Seui,” did by intimidation, take from the person and presence of another money belonging to, and in the care, custody, control, management, and possession of the Central Pacific Bank – Wahiawa Branch, a

bank as defined in Title 18, United States Code, Section 2113(f), in violation of Title 18, United States Code, Section 2113(a).

**COUNT 3**

On or about May 13, 2014, in the District of Hawaii, defendants KALANI WATSON, aka “Kiki Seui” and ROGUSSIA EDDIE ALLEN DANIELSON, did by intimidation, take from the person and presence of another money belonging to, and in the care, custody, control, management, and possession of the American Savings Bank – Salt Lake Branch, a bank as defined in Title 18, United States Code, Section 2113(f), in violation of Title 18, United States Code, Section 2113(a).

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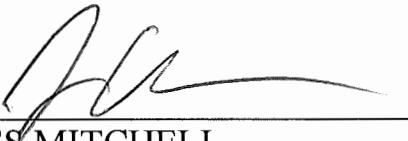
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## COUNT 4

On or about May 30, 2014, in the District of Hawaii, defendants KALANI WATSON, aka "Kiki Seui," ROGUSSIA EDDIE ALLEN DANIELSON and AJ WILLIANDER, did by intimidation, take from the person and presence of another money belonging to, and in the care, custody, control, management, and possession of the American Savings Bank – Aiea Branch, a bank as defined in Title 18, United States Code, Section 2113(f), in violation of Title 18, United States Code, Section 2113(a).

I further state that I am a Special Agent with the Federal Bureau of Investigation (FBI) and that this Complaint is based upon the facts set forth in the attached "Affidavit in Support of Criminal Complaint", which is incorporated herein by reference.

DATED: August 11, 2014, at Honolulu, Hawaii.

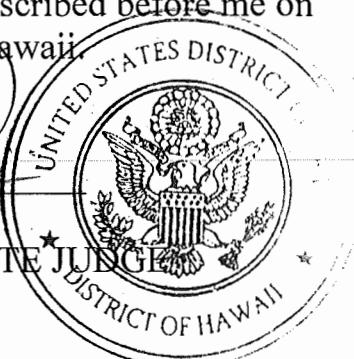


JAMES MITCHELL  
FBI SPECIAL AGENT

Subscribed to and sworn and subscribed before me on  
August 11, 2014, at Honolulu, Hawaii.



RICHARD L. PUGLISI  
UNITED STATES MAGISTRATE JUDGE  
District of Hawaii



**AFFIDAVIT IN SUPPORT OF APPLICATION**  
**FOR A CRIMINAL COMPLAINT**

I, James D. Mitchell, being first duly sworn, depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since October 2012. I am currently assigned to the Criminal Enterprise Squad of the FBI Honolulu Field Office where my duties include, but are not limited to, investigating narcotics trafficking, money laundering, organized crime, and violent crime, including armed bank robberies. Since my assignment to the squad, I have conducted physical and electronic surveillance on multiple occasions, reviewed and analyzed numerous recorded conversations, and debriefed multiple confidential informants and cooperating witnesses. I have participated in investigations which utilized Title III investigations and telephone records to effectively identify subjects and gather evidence. Additionally, I worked as a bank examiner with the Federal Deposit Insurance Corporation for seven years and gained knowledge on how bank robbers execute bank robberies. Through my training, education, and experience, I have become familiar with the manner in which criminals, including bank robbers, operate, and the efforts of those involved in such activity to avoid detection by law enforcement.

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2. The facts in this affidavit come from my personal observations and knowledge, my training and experience, information provided to me by other law

enforcement personnel, public records, and witnesses, and Confidential Source (CS) information. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all of my knowledge about this matter.

3. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of Title 18, U.S.C. § 2113 - Bank Robbery, as well as Title 18, U.S.C. § 1951 – Interference with Commerce by Threats or Violence, have been committed and may continue to be committed by MARCUS WATSON, ROGUSSIA DANIELSON, and AJ WILLIANDER.

PROBABLE CAUSE

4. The FBI and other state and federal law enforcement agencies have been investigating WATSON, DANIELSON, and WILLIANDER for their suspected involvement in the armed robberies of a Reynolds Recycling, Inc. facility and three banks. WATSON is suspected of committing an armed robbery of a Reynolds Recycling, Inc. facility, the Central Pacific Bank Wahiawa branch, the American Savings Bank (ASB) Salt Lake branch, and the ASB Pearlridge branch. It is believed that DANIELSON is involved in the ASB Salt Lake branch robbery and the ASB Pearlridge branch robbery, while WILLIANDER was the getaway driver for the ASB Pearlridge branch robbery.

5. At approximately, 9:35 a.m. on April 22, 2014, an unknown male entered a Reynolds Recycling, Inc. storefront located at 4510 Salt Lake Boulevard, Honolulu, Hawaii 96818, and brandished a black semi-automatic pistol. Reynolds Recycling, Inc. employees, S.L. and S.D., were both working at the Reynolds Recycling location when the robbery occurred and the suspect pointed his gun at both employees. Both S.D. and S.L. believed the suspect was African American and S.D. thought the suspect might have been Samoan mix. Both S.D. and S.L. said the suspect was wearing a black ski mask and light brown colored hooded jacket and they could see the suspect's hands. S.D. and S.L. stated the suspect demanded money from the cash register and threatened to shoot them both if they did not quickly put the money in his black backpack. S.D. and S.L. surrendered \$585.26 to the suspect. The suspect then exited the building and fled on foot along Salt Lake Boulevard on the eastern sidewalk. Reynolds Recycling, Inc., of Honolulu, Hawaii redeems aluminum cans, plastic and glass bottles, and steel and bimetal cans at the state's largest certified redemption center network. Reynolds Recycling, Inc. processes over one million transactions a year, which includes the shipping of products to and from the State of Hawaii to other states on the mainland, to include California. Additionally, Reynolds Recycling, Inc. ships items from Hawaii to other countries, including China.

6. At approximately 10:05 a.m. on May 1, 2014, an unknown male entered the Wahiawa branch of Central Pacific Bank (CPB), located at 935 California Avenue, Wahiawa, Hawaii 96786. Witnesses in the bank at the time of the robbery stated that the unknown male was wearing a dark colored jacket, gray colored hoodie, a dark colored ski mask, and carrying a black backpack. Additionally, witnesses stated the unknown male appeared to be African American, brandished a dark colored handgun and demanded money from three tellers. The tellers surrendered \$6,911 to the unknown male before he exited the bank and fled the scene on foot. Video surveillance of the bank during the robbery showed one individual robbing the bank while dressed as described above. At the time of the robbery, deposits at CPB were insured by the Federal Deposit Insurance Corporation.

7. At approximately 10:27 a.m. on May 13, 2014, two unknown males entered the Salt Lake branch of ASB, located at 848 Ala Lilikoi Street, Honolulu, Hawaii 96818. Witnesses in the bank at the time of the robbery stated Suspect #1 appeared to be African American and was wearing a gray colored hoodie with red print on the front, a dark colored ski mask, and brandished a dark colored handgun. Suspect #2 was wearing a tan jacket, a dark colored mask and brandished a dark colored long gun. Suspect #2 stood guard at the front door of the bank, while

Suspect #1 demanded money from four tellers. The tellers surrendered \$21,720.93 to Suspect #1. Both suspects then exited the bank and fled on foot. Video surveillance of the bank during the robbery showed Suspect #1 and Suspect #2 robbing the bank while dressed as described above. At the time of the robbery, deposits at ASB were insured by the Federal Deposit Insurance Corporation.

8. At approximately 10:00 a.m. on May 30, 2014, two unknown males entered the Pearlridge branch of ASB located at 98-200 Kamehameha Highway, Aiea, Hawaii 96701. Suspect #1 was wearing a black colored hoodie, sweatpants, mask and gloves. Suspect #2 was wearing a gray colored hoodie, sweatpants, mask and gloves. Witnesses in the bank at the time of the robbery stated that both suspects brandished dark colored handguns and approached the tellers demanding money to be placed in a bag. The tellers surrendered \$11,569 to the suspects. Once the suspects received the money, witnesses stated the suspects exited the bank on foot and fled in the direction of the Pearlridge shopping area, and along a canal by Jungle River Mini Golf. Video surveillance of the bank during the robbery showed Suspect #1 and Suspect #2 robbing the bank while dressed as described above. At the time of the robbery, deposits at ASB were insured by the Federal Deposit Insurance Corporation.

9. On June 21, 2014, a CS provided information disclosing the identities of the individuals responsible for the armed robberies of the Reynolds Recycling, Inc. business and the three banks. CS advised that MARCUS KALANI WATSON, aka KIKI SEUI, ROGUSSIA EDDIE ALLEN DANIELSON, and AJ WILLIANDER were involved in the robberies. CS related that WATSON committed the Reynolds Recycling, Inc. robbery, the Wahiawa CPB robbery, the Salt Lake ASB robbery, and the Pearlridge ASB robbery. DANIELSON participated in the Salt Lake and Pearlridge ASB robberies, while WILLIANDER was the getaway driver in the Pearlridge ASB robbery.

10. On June 26, 2014, CS was administered a polygraph examination by the FBI. CS passed the polygraph examination.

11. WATSON told CS that he committed the Reynolds Recycling, Inc. robbery on April 22, 2014. Telephone records on April 22, 2014, indicated that phone number 808-782-1780 contacted CS at 8:32 pm. Subscriber information for 808-782-1780 indicated that the subscriber is A. WILLIANDER. CS advised the phone was owned by WILLIANDER, but was being used by WATSON. WATSON and CS subsequently met up and WATSON told CS details about what the employees said and did during the robbery, including that the “local” male working at Reynolds Recycling threw money on the ground during the robbery,

while the “haole” male employee placed the money in the bag. A conversation with the CS and WATSON indicated that WATSON became upset with the “local” male when he threw the money on the ground during the robbery. During the conversation, WATSON stated “I should’ve shoot that fucking stupid Hawaiian, yeah I should’ve killed that stupid Hawaiian, he was the one acting tough, he almost got shot right in his chest. Yeah, nigga I was going to bust that nigga’s chest open, he thought I was playing too, that bitch ass nigga, I cocked the gun, I aimed it at him.” WATSON later on stated “I made him pick the money up and put it in my bag, the same nigga that threw it on the ground, I will make that bitch ass, he didn’t tell you all that, that I told that bitch ass nigga to hurry up and put the money in the bag.” Honolulu Police Department (HPD) interviews of the Reynolds Recycling employees confirmed that money was thrown onto the ground and that WATSON cocked his gun and pointed it at the Reynolds Recycling, Inc. employees.

12. On April 24, 2014, two days after the Reynolds Recycling, Inc. robbery, WATSON posted a photograph of himself on his Facebook account holding a large amount of cash.

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13. WATSON told CS that he committed the Wahiawa CPB robbery on May 1, 2014. WATSON told CS that he called “TheBus” prior to the robbery of

the CPB to find out when it would be stopping near the library in Wahiawa. WATSON was told that the bus would be by the library between 9:58 am and 10:07 am. Surveillance video obtained from “TheBus” shows WATSON boarding the #62 bus on California Avenue, Wahiawa, fronting the Wahiawa library, at 10:11 am on May 1, 2014. The Wahiawa Library, 823 California Avenue, is located across the street from the Wahiawa Town Center, where the CPB is located. In the surveillance video WATSON appears to have changed his clothing and is seen with a black backpack over his shoulder. CS related that WATSON said he threw some clothes he wore during the bank robbery into a trash can by Long’s Drugs, and then boarded “TheBus,” route #62, at approximately 10:07 am. The CPB bank was reportedly robbed at approximately 10:05 am. WATSON told CS that he saw police cars heading to the CPB while he was on “TheBus.”

14. The CS related that after the CPB robbery, WATSON bought an old white Lexus for \$2,000 and spent \$3,000 on dental work. The CS described the Lexus as an older white LS400 with tinted windows, a black fender, and new tires with silver 20” rims. CS said that the Lexus was parked under a tarp at the Halawa Housing complex in Aiea. A Lexus underneath a tarp, similar to the description that the CS provided, was located in the Halawa Housing complex.

15. L.A., the office manager at Kings Dental and Implant Services, located at 555 North King Street, Honolulu, Hawaii, advised Affiant that on May 8, 2014, WATSON spent \$2,810 for a root canal and crown at Kings Dental and Implant Services. L.A. advised that WATSON paid the full amount for the dental work in cash.

16. WATSON told CS that for the ASB Salt Lake robbery on May 13, 2014, he recruited DANIELSON to help him rob the bank. WATSON said he used a black handgun and DANIELSON used an old shotgun while robbing the bank. DANIELSON stood by the door with the shotgun during the robbery while WATSON robbed the tellers. Video footage of the bank robbery shows the robber with a shotgun standing by the bank door while the other individual robbed the tellers. CS said that WATSON was the mastermind behind the robbery. WATSON told CS that they used the white Lexus as the getaway car and that he and DANIELSON parked it about a block away from the bank. In order to get to the Lexus after the robbery, WATSON and DANIELSON had to run up a hill and through a hole in a fence. They then drove away from the bank.

17. Surveillance video footage was obtained from the corner of Salt Lake Boulevard and Kahikolu Street. A white Lexus closely matching the description of WATSON'S Lexus (same color, rims and black fender) arrived at approximately

10:10 a.m. from the West and was seen at approximately 10:30 a.m. heading Westbound. The bank was reportedly robbed at approximately 10:28 am.

18. Approximately two or three days after the ASB Salt Lake robbery, the CS saw a black handgun with a silver ejection port, possibly a 9 millimeter or 40 caliber, on the driver side floor of the Lexus. The CS also saw a big shotgun in the trunk of the Lexus.

19. WATSON told CS that he and DANIELSON robbed the Pearlridge ASB on May 30, 2014, and WILLIANDER was the getaway driver. WATSON told CS that after the Pearlridge ASB robbery, he and DANIELSON both ran to a nearby canal and had to scale a wall before getting picked up by WILLIANDER. CS was not sure which vehicle WILLIANDER used as the getaway car for the Pearlridge ASB robbery. CS thought that it was possibly WILLIANDER'S white Toyota Tercel. CS said that WILLIANDER also drives a white Toyota Camry, and a silver Dodge Magnum that is owned by WILLIANDER'S mother.

20. On May 30, 2014, at approximately 10:00 a.m., surveillance footage from the Pali Momi camera near Straub, showed an older model white Toyota Tercel, consistent with one registered to A. Williander, and frequently driven by

AJ WILLIANDER. WILLIANDER'S vehicle has a passenger side dent, as does the vehicle in the surveillance footage.

21. Evidence recovered from the ASB Pearlridge bank crime scene included four gloves that were found near a canal a short distance from the ASB Pearlridge bank. Eye witnesses identified two males with masks on that matched the description of the robbers. The eye witnesses advised the males were running in the same pathway that the gloves were found. The gloves located appeared to be the same type as the gloves worn by the robbers in the bank's video surveillance of the robbery.

22. The recovered gloves were analyzed by the HPD Scientific Investigation Section (SIS). DNA profiles were obtained from three of the gloves.

23. On June 25, 2014, HPD obtained covert samples of DANIELSON's DNA. The DNA was subsequently sent to the HPD SIS for processing. The DNA profile from one of the gloves retrieved from the ASB Pearlridge bank robbery was a positive DNA match with DANIELSON's DNA profile.

24. CS advised that on the same day of the last bank robbery, WATSON was concerned that law enforcement might contact him, and WATSON'S mother booked him on a one-way flight on Alaska Airlines from Honolulu, Hawaii to

Oakland, California. Verification of the flight information was made by HPD, and it was determined that on June 2, 2014, WATSON boarded flight #838 to Oakland, CA. WATSON told CS that he planned to stay with his mother and brother in California for a month, and was planning on doing another robbery.

25. A June 12, 2014, posting on DANIELSON'S Facebook account shows DANIELSON holding a large amount of paper currency spread out in one hand, and a large stack of money in the other by his ear.

26. Subscriber information for 808-673-5521 indicated that the subscriber is KEAK SEUI. The service address of the phone is listed as 99-171 Kohomua Street, Aiea, Hawaii 96701. The phone was activated on May 5, 2014. CS advised that WATSON is often referred to as KEAK or KIKI SEUI. On June 26, 2014, CS made a recorded telephone call to WATSON at telephone number 808-673-5521. During the conversation WATSON said that he was in the Bay area of California and had been arrested by the police. Verification of WATSON'S arrest in California was made by the FBI. On June 8, 2014, WATSON was arrested in Vallejo, California on an outstanding warrant.

27. Information derived from toll records as well as Pen Register, Trap and Trace device for phone numbers 808-673-5521 (phone believed to be used by

WATSON), and 808-782-1780 (phone believed to be used by WILLIANDER), and 808-699-0883 (phone believed to be used by DANIELSON) indicate that these three phone numbers have frequent contact with one another. Subscriber information for 808-699-0883 indicated that the subscriber is ROGUSSIA DANIELSON, who resides at 99-175 Kohomua Street, Apartment 6E, Aiea, Hawaii, 96701. The phone was activated on May 7, 2014.

28. Telephone records on May 13, 2014, indicated that phone number 808-699-0883 (phone believed to be used by DANIELSON) and phone number 808-673-5521 (phone believed to be used by WATSON) were in contact with each other at 8:55 a.m., 9:17 a.m., and 9:42 a.m. and 11:41 a.m. The approximate time of the ASB Salt Lake branch bank robbery was 10:27 a.m.

29. Telephone records on May 30, 2014, indicated that phone number 808-673-5521 (phone believed to be used by WATSON) and phone number 808-699-0883 (phone believed to be used by DANIELSON) were in contact with each other at 7:58 a.m., 7:59 a.m., and 8:00 a.m. Additionally, phone number 808-673-5521 (phone believed to be used by WATSON) was in contact with 808-780-1780 (phone believed to be used by WILLIANDER) at 8:01 a.m. The approximate time of the ASB Pearlridge branch bank robbery was 10:00 a.m.

30. Your Affiant believes WATSON is involved in all the aforementioned robberies. This belief is founded upon similarities in the physical description of the robber given by witnesses at each of the four robberies; similarities in the disguise worn by the robber in each robbery (including ski masks); and similarities in the method of each robbery's commission (carrying a dark colored handgun) and the way the subject demanded money in all four robberies.

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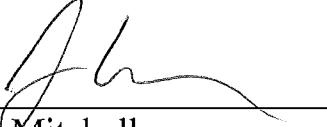
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**Conclusion**

31. As set forth above, based upon the facts contained in this affidavit, there is probable cause to believe, and I do believe, that WATSON, DANIELSON, and WILLIANDER have committed offenses in violation of Title 18, United States Code, Section 2113 – bank robbery and WATSON has committed an offense in violation of Title 18, United States Code, Section § 1951 – Interference with Commerce by Threats or Violence. Affiant, being duly sworn, states that the facts contained in the foregoing affidavit are true to the best of my knowledge, information, and belief.

DATED: August 11, 2014, at Honolulu, Hawaii.

  
James D. Mitchell  
Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn to before  
me on August 11, 2014.

  
RICHARD L. PUGLISI  
United States Magistrate Judge

